

1 [Submitting Counsel on Signature Page]
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

People of the State of California, et al.

MDL No. 3047

v.

Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; Meta Platforms Technologies, LLC,

Case Nos. 4:22-md-03047-YGR-PHK
4:23-cv-05448-YGR

STATE ATTORNEYS GENERAL'S MOTION FOR RELIEF FROM NONDISPOSITIVE PRETRIAL ORDER OF MAGISTRATE JUDGE

IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY PRODUCTS LIABILITY LITIGATION THIS DOCUMENT RELATES TO:

Judge: Hon. Yvonne Gonzalez Rogers

4:23-cv-05448.

Magistrate Judge: Hon. Peter H. Kang

1 Pursuant to Federal Rule of Civil Procedure 72(a), 28 U.S.C. § 636(b)(1)(A), and Civil
 2 Local Rule 72, Plaintiff State Attorneys General respectfully submit this Motion for Relief from
 3 the Nondispositive Pretrial Order of the Magistrate Judge relating to Discovery Management Order
 4 No. 14 Following the Discovery Management Conference of January 16, 2025. (ECF No. 1646).

5 The State Attorneys General, as chief law enforcement officers in their respective states,
 6 have authority to bring enforcement actions independent of other state agencies. The Discovery
 7 Management Order No. 14 Following the Discovery Management Conference of January 16, 2025
 8 (ECF No. 1646) (hereinafter, “DMO 14” or “Order”) disrupts this internal state organization by
 9 reading Rule 30(b)(6) to require State AGs to provide testimony for multiple distinct state
 10 government agencies in the present enforcement action, since each “State” is a “Party,”¹
 11 notwithstanding that those other agencies are uninvolved in this litigation besides Meta’s creative
 12 discovery designs. (*See* Order at 17, 19, and 21).² In the same breath, the Order concludes that there
 13 is “no way for Meta to try to take discovery from state agencies by using a 30(b)(6) deposition
 14 notice directed to a Plaintiff,” seemingly ignoring the fact that Meta’s Notices defined each
 15 “Plaintiff” “State” to encompass 200-plus state agencies and unfamiliar topics, information for
 16 which the State AGs would either need to gather from those agencies or designate a testifying
 17 witness from those agencies themselves.³

18 There is no case law, anywhere, concluding that multiple state agencies can be subject to a
 19 single Rule 30(b)(6) deposition notice, and DMO 14 does not cite any such authority. *See Bensiek*
 20 *v. Lamone*, No. CV JKB-13-3233, 2017 WL 659929, at *2 (D. Md. Feb. 14, 2017) (“Plaintiffs . . .
 21 cited no authority for the notion that a designee for one governmental agency can testify as to the

22 ¹ Neither the State of Maryland nor the State of New Jersey are parties to this suit, but rather, it is
 23 each of those states’ respective office of the attorney general that is the named Plaintiff, as well as
 24 the New Jersey Division of Consumer Affairs, but DMO 14 nevertheless grouped these states
 25 with the other State AG Plaintiffs without explanation.

26 ² DMO 14 wrongly generalizes that every State AG exercises its “parens patriae” authority in
 27 pursuing actions under state consumer protection law. (Order at 20); *see, e.g., People v. Ashford*
Univ., LLC, 319 Cal. Rptr. 3d 132, 165 (Cal. Ct. App. 2024) (discussing constitutional authority
 28 of California State AG, as chief law enforcement officer, to bring consumer protection claims).

³ Topics in Meta’s Amended Rule 30(b)(6) notices which fall entirely outside of the purview of
 the State AGs include Topics 3, 7, 13, 18 and 19.

knowledge of another governmental agency.”). DMO 14 overlooks the fact that Meta’s Rule 30(b)(6) notices (hereinafter, “Notices”) defined each “State” to include multiple state agencies and does not adequately address how the State AGs would be responsible for either learning that information from state agencies or presenting witnesses from nonparty state agencies for testimony. These legal conclusions and factual findings are both “contrary to law” and “clearly erroneous.”
See Fed. R. Civ. P. 72(a).

I. Portions of the Magistrate Judge’s Order to Which an Objection is Made

The State AGs object to the portion of DMO 14 discussing 30(b)(6) disputes, specifically the legal issue of whether Meta properly noticed its Rule 30(b)(6) Notices to include multiple state agencies, and the factual issue of whether Meta seeks party discovery from state agencies. (Order at 15–21). DMO 14 concludes that State AGs bringing actions in their independent enforcement authority under state or federal laws are charged with providing party testimony on behalf of the “State,” including with respect to independent state agencies otherwise uninvolved in this case, because the “State” is the “Party.” DMO 14 misapprehends a long-recognized, fundamental feature of state sovereignty: States are free to “allocate authority among different officials who do not answer to one another. . . .” *Berger v. N. Carolina State Conf. of the NAACP*, 597 U.S. 179, 191 (2022); *see, e.g.*, S.C. 2024–25 Appropriation Act, Part IB, § 59.16. States are neither monoliths nor are they corporate conglomerates. DMO 14 ignores the overwhelming weight of relevant federal authority and misunderstands how Meta’s Notices seek agency discovery.

II. Court Action Requested

The State AGs ask the Court to hold that the Magistrate Judge’s conclusion that Meta may notice a single 30(b)(6) deposition to multiple agencies in state law enforcement actions is “contrary to law” and “clearly erroneous.” Fed. R. Civ. P. 72(a). The State AGs ask the Court to deem Meta’s Notices improper under Rule 30(b)(6) and to direct Meta to issue amended, appropriately targeted individual notices and subpoenas to “a governmental agency” directly rather than seeking information through each state as a monolith.

III. Reasons and Authority Supporting the Motion

Under Fed. R. Civ. P. 72(a), a magistrate judge’s order on a non-dispositive motion may be

1 modified or set aside if its legal conclusions are “contrary to law” or if its factual determinations
 2 are “clearly erroneous.” Fed. R. Civ. P. 72(a). “The magistrate’s legal conclusions are reviewed *de*
 3 *novo* to determine whether they are contrary to law.” *Guidiville Rancheria of California v. United*
 4 *States*, No. 12-CV-1326 YGR, 2013 WL 6571945, at *1 (N.D. Cal. Dec. 13, 2013) (citation
 5 omitted)). Factual determinations may be overturned under the clear error standard when “the court
 6 reaches a ‘definite and firm conviction that a mistake has been committed.’” *Guidiville*, 2013 WL
 7 6571945, at *1 (citation omitted)).

8 **A. One Governmental Agency Cannot be Required to Provide Rule 30(b)(6)**
 9 **Testimony based on the Knowledge of Other Distinct Governmental Agencies**

10 Despite what DMO 14 insinuates, the State AGs have never argued that they were exempt
 11 from Rule 30(b)(6) by virtue of their status as law enforcement agencies. (*See Order* at 21).
 12 Certainly, Rule 30(b)(6) itself contemplates that “a party may name as the deponent . . . a
 13 governmental agency or other entity.” Fed. R. Civ. P. 30(b)(6). But the plain language of Rule
 14 30(b)(6) is phrased in the singular when testimony is from “a governmental agency.” Fed. R. Civ.
 15 P. 30(b)(6). That state law enforcement agencies exercising their independent enforcement
 16 authority can trigger uninvolved state agencies to be required to provide party testimony finds no
 17 support in relevant case law, and neither DMO 14 nor Meta cite any such authority. (*See Order* at
 18 15–21). The few courts that have considered this issue have concluded that “[t]here is no duty
 19 imposed [under Rule 30(b)(6)] to inquire into the knowledge of another entity.” *Covington v.*
 20 *Semones*, 2007 WL 1052460, at *1 (W.D. Va. Apr. 5, 2007); *Bensiek*, 2017 WL 659929, at *2 (“It
 21 is one thing to find [the State AGs] have the practical ability to obtain documents and basic
 22 information from nonparties, [but] it is quite another to expect that they should immerse themselves
 23 into another state agency’s records and be able to testify as to that other agency’s knowledge.”).

24 Courts are even reluctant to require corporate affiliates to provide testimony for a sister
 25 company without some requisite showing of factors like self-involvement or centralized decision
 26 making. *See In re: Ski Train Fire of November 11, 2000 Kaprun Austria*, 2006 WL 1328259, at *9
 27 (S.D.N.Y. May 16, 2006) (rejecting 30(b)(6) notices to corporate parent seeking subsidiary
 28 information because it is not appropriate “to require a corporate parent to acquire all of the

knowledge of the subsidiary on matters in which the parent was not involved, and to testify to those matters in a manner which binds the parent, a separate legal entity"). The only cases Meta can cite in support are those where these factors are present, namely, **cases following mergers:** *Emhart Indus., Inc. v. Univar USA, Inc.*, 2009 WL 10675670, at *4 (W.D. Wash. Feb. 12, 2009); *Santa Clarita Valley Water Agency v. Whittaker Corp.*, 2020 WL 8102054, at *9 (C.D. Cal. July 9, 2020); *Int'l Bhd. of Teamsters, Airline Div. v. Frontier Airlines, Inc.*, 2013 WL 627149, at *5 (D. Colo. Feb. 19, 2013); **cases about contract negotiations:** *Bigsby v. Barclays Cap. Real Est., Inc.*, 329 F.R.D. 78, 82 (S.D.N.Y. 2019); *Oliver v. Greenwell*, 2023 WL 2524901, at *1 (E.D. Mo. Mar. 15, 2023); **cases about retained agents or vendors:** *Anstead v. Va. Mason Med. Ctr.*, 2022 WL 1641425, at *4 (W.D. Wash. May 24, 2022); *Coty Inc. v. Excell Brands, LLC*, 2016 WL 7187630, at *3 (S.D.N.Y. Dec. 9, 2016); *Calzaturificio S.C.A.R.P.A. s.p.a. v. Fabiano Shoe Co.*, 201 F.R.D. 33, 38 (D. Mass. 2001); **or a case where corporate affiliates shared a president:** *Erenler v. TJM Props., Inc.*, 2022 WL 18492699, at *6 (M.D. Fla. Nov. 7, 2022). Cases Meta may cite about depositions to the "United States" are inapposite because they either do not concern depositions, *United States v. Fed. Res. Corp.*, 2012 WL 1623408, at *3 (D. Idaho May 9, 2012) (discussing litigation holds and documents); or where they do, they do not address the present issue about independent law enforcement authority and otherwise uninvolved, distinct governmental agencies. See *United States v. Land O'Lakes, Inc.*, 2018 WL 11411337, at *1 (W.D. Okla. Oct. 24, 2018) (case brought by U.S. DOJ stemming from EPA investigation). Meta also may cite cases where a foreign nation has been deemed an "entity" under Rule 30(b)(6), but where the language of 30(b)(6) expressly identifies "a governmental agency," those cases do not address whether multiple governmental agencies can be required to testify under a single Rule 30(b)(6) notice. See *Cont'l Transfert Technique Ltd. v. Fed. Gov't of Nigeria*, 308 F.R.D. 27, 33–34 (D.D.C. 2015).

Here, the State AGs pursued this case in their independent enforcement capacities as set forth in applicable state and federal law. *Berger*, 597 U.S. at 191. Given the clear weight of relevant authority, DMO 14's conclusion that multiple governmental agencies can be subject to party testimony under a single Rule 30(b)(6) notice in a state law enforcement action is "contrary to law." See Fed. R. Civ. P. 72(a); *Bensiek*, 2017 WL 659929, at *2; *Covington*, 2007 WL 1052460, at *1;

1 *In re: Ski Train*, 2006 WL 1328259, at *9.

2 **B. The State AGs are Put in the Impossible Position of Testifying about Other**
 3 **Agencies' Information Not Reasonably Available to the State AGs.**

4 DMO 14 concluded that there is “no way for Meta to try to take discovery of state agencies
 5 by using a 30(b)(6) notice directed to a Plaintiff,” seemingly because the State AGs may designate
 6 whomever they wish to be a witness. (Order at 20). This conclusion does not account for the fact
 7 that Meta defined “State” in its Notices to include information from over 200 agencies that were
 8 ordered last September to produce documents in this litigation⁴, or that the State AGs have no
 9 authority to compel witnesses from those agencies to testify. Nor does it account for the fact that
 10 several topics in Meta’s Notices seek information entirely within the purview of those independent
 11 state agencies such that even if State AGs presented their own witnesses, state agency information
 12 is not reasonably available to them given agencies’ prerogative to refuse cooperation under the
 13 authority of state governors or other separately elected officials, not to mention the sheer volume
 14 of information that would entail reviewing and preparing. *See Bensiek*, 2017 WL 659929, at *2.
 15 Given the scope of Meta’s topics, DMO 14 overlooks how Meta defined State to capture multiple
 16 state agencies in discovery and is thus “clearly erroneous.” *See Fed. R. Civ. P. 72(a).*

17

18

19

20

21

22

23

24

25 ⁴Meta defines “State” as “including, but not limited to, the executive and legislative branches,
 26 agencies, offices, departments, divisions, commissions, committees, agents, employees, boards,
 27 instrumentalities, vendors (to the extent the State has possession, custody or control over them),
 28 administrators, and other persons or entities acting on behalf of the State, including, but not
 limited to, the agencies and other entities whose information has been deemed within the State’s
 control for purposes of discovery in Magistrate Judge Kang’s September 6 2024 order (ECF No.
 1117) and any other related entities.”

1 Dated: February 19, 2025

2 **KRIS MAYES**
 3 Attorney General
 4 State of Arizona

5 /s/ Laura Dilweg
 6 Laura Dilweg (AZ No. 036066 CA No. 260663)
 7 Chief Counsel – Consumer Protection and
 8 Advocacy Section
 9 Nathan Whelihan (AZ No. 037560),
 10 *pro hac vice*
 11 Assistant Attorney General
 12 Arizona Attorney General's Office
 13 2005 North Central Avenue
 14 Phoenix, AZ 85004
 15 Phone: (602) 542-3725
 16 Fax: (602) 542-4377
 17 Laura.Dilweg@azag.gov
 18 Nathan.Whelihan@azag.gov

19 *Attorneys for Plaintiff State of Arizona, ex rel.*
 20 *Kris Mayes, Attorney General*

21 **PHILIP J. WEISER**
 22 Attorney General
 23 State of Colorado

24 /s/ Lauren M. Dickey
 25 Lauren M. Dickey (CO Reg. No. 45773)
 26 First Assistant Attorney General
 27 Megan Paris Rundlet (CO Reg. No. 27474)
 28 Senior Assistant Solicitor General
 29 Elizabeth Orem (CO Reg. No. 58309)
 30 Assistant Attorney General
 31 Colorado Department of Law
 32 Ralph L. Carr Judicial Center
 33 Consumer Protection Section
 34 1300 Broadway, 9th Floor
 35 Denver, CO 80203
 36 Phone: (720) 508-6651
 37 lauren.dickey@coag.gov

38 *Attorneys for Plaintiff State of Colorado, ex rel.*
 39 *Philip J. Weiser, Attorney General*

Respectfully submitted:

1 **ROB BONTA**
 2 Attorney General
 3 State of California

4 /s/ Megan O'Neill
 5 Nicklas A. Akers (CA SBN 211222)
 6 Senior Assistant Attorney General
 7 Bernard Eskandari (CA SBN 244395)
 8 Emily Kalanithi (CA SBN 256972)
 9 Supervising Deputy Attorneys General
 10 Megan O'Neill (CA SBN 343535)
 11 Nayha Arora (CA SBN 350467)
 12 David Beglin (CA SBN 356401)
 13 Joshua Olszewski-Jubelirer
 14 (CA SBN 336428)
 15 Marissa Roy (CA SBN 318773)
 16 Brendan Ruddy (CA SBN 297896)
 17 Deputy Attorneys General
 18 California Department of Justice
 19 Office of the Attorney General
 20 455 Golden Gate Ave., Suite 11000
 21 San Francisco, CA 94102-7004
 22 Phone: (415) 510-4400
 23 Fax: (415) 703-5480
 24 megan.oneill@doj.ca.gov

25 *Attorneys for Plaintiff the People of the State*
 26 *of California*

27 **RAÚL R. LABRADOR**
 28 Attorney General
 29 State of Idaho

30 /s/ Nathan Nielson
 31 Nathan H. Nielson (ID Bar No. 9234),
 32 pro hac vice
 33 Deputy Attorneys General
 34 Attorney General's Office
 35 P.O. Box 83720
 36 Boise, ID 83720-0010
 37 (208) 334-2424
 38 nathan.nielson@ag.idaho.gov

39 *Attorneys for Plaintiff State of Idaho*

1 **WILLIAM TONG**
 2 Attorney General
 3 State of Connecticut

4 /s/ Tess E. Shaw
 5 Krislyn M. Launer
 6 (CT Juris No. 440789), *pro hac vice*
 7 Tess E. Shaw
 8 (CT Juris No. 444175), *pro hac vice*
 9 Assistant Attorneys General
 10 Connecticut Office of the Attorney General
 11 165 Capitol Avenue
 12 Hartford, Connecticut 06106
 13 Phone: 860-808-5306
 14 Fax: 860-808-5593
 15 Lauren.Bidra@ct.gov
 16 Krislyn.Launer@ct.gov
 17 Tess.Shaw@ct.gov

18 *Attorneys for Plaintiff State of Connecticut*

19 **KATHLEEN JENNINGS**
 20 Attorney General
 21 State of Delaware

22 /s/ Marion Quirk
 23 Marion Quirk (DE Bar 4136), *pro hac vice*
 24 Director of Consumer Protection
 25 Ryan T. Costa (DE Bar 5325), *pro hac vice*
 26 Deputy Director of Consumer Protection
 27 Delaware Department of Justice
 28 820 N. French Street, 5th Floor
 29 Wilmington, DE 19801
 30 Phone: (302) 683-8810
 31 Marion.Quirk@delaware.gov
 32 Ryan.Costa@delaware.gov

33 *Attorneys for Plaintiff State of Delaware*

34 **THEODORE E. ROKITA**
 35 Attorney General
 36 State of Indiana

37 /s/ Scott L. Barnhart
 38 Scott L. Barnhart (IN Atty No. 25474-82),
 39 *pro hac vice*
 40 Chief Counsel and Director of Consumer
 41 Protection
 42 Corinne Gilchrist (IN Atty No. 27115-53),
 43 *pro hac vice*
 44 Section Chief, Consumer Litigation
 45 Mark M. Snodgrass (IN Atty No. 29495-49),
 46 *pro hac vice*
 47 Deputy Attorney General
 48 Office of the Indiana Attorney General
 49 Indiana Government Center South
 50 302 West Washington St., 5th Floor
 51 Indianapolis, IN 46203
 52 Telephone: (317) 232-6309
 53 Scott.Barnhart@atg.in.gov
 54 Corinne.Gilchrist@atg.in.gov
 55 Mark.Snodgrass@atg.in.gov

56 *Attorneys for Plaintiff State of Indiana*

57 **KRIS W. KOBACH**
 58 Attorney General
 59 State of Kansas

60 /s/ Sarah M. Dietz
 61 Sarah M. Dietz, Assistant Attorney General
 62 (KS Bar No. 27457), *pro hac vice*
 63 Kaley Schrader, Assistant Attorney General
 64 (KS Bar No. 27700), *pro hac vice*
 65 Office of the Attorney General
 66 120 SW 10th Avenue, 2nd Floor
 67 Topeka, Kansas 66612
 68 Telephone: (785) 296-3751
 69 Fax: (785) 296-3131
 70 Email: sarah.dietz@ag.ks.gov

71 *Attorneys for Plaintiff State of Kansas*

1 **ANNE E. LOPEZ**
 2 Attorney General
 3 State of Hawai‘i

4 */s/ Christopher T. Han*
 5 Christopher J.I. Leong (HI JD No. 9662),
 6 *pro hac vice*
 7 Supervising Deputy Attorney General
 8 Kelcie K. Nagata (JI JD No. 10649),
 9 *pro hac vice*
 10 Christopher T. Han (HI JD No. 11311),
 11 *pro hac vice*
 12 Deputy Attorneys General
 13 Department of the Attorney General
 14 Commerce and Economic Development Division
 15 425 Queen Street
 16 Honolulu, Hawai‘i 96813
 17 Phone: (808) 586-1180
 18 Christopher.ji.leong@hawaii.gov
 19 Kelcie.k.nagata@hawaii.gov
 20 Christopher.t.han@hawaii.gov

21 *Attorneys for Plaintiff State of Hawai‘i*

22 **KWAME RAOUL**
 23 Attorney General
 24 State of Illinois

25 */s/ Matthew Davies*
 26 Susan Ellis, Chief, Consumer Protection
 27 Division (IL Bar No. 6256460)
 28 Greg Grzeskiewicz, Chief, Consumer
 1 Fraud Bureau (IL Bar No. 6272322)
 2 Jacob Gilbert, Deputy Chief, Consumer Fraud
 3 Bureau (IL Bar No. 6306019)
 4 Matthew Davies, Supervising Attorney,
 5 Consumer Fraud Bureau (IL Bar No. 6299608),
 6 *pro hac vice*
 7 Kevin Whelan, Supervising Attorney,
 8 Consumer Fraud Bureau (IL Bar No. 6321715),
 9 *pro hac vice*
 10 Emily María Migliore, Assistant Attorney
 11 General, Consumer Fraud Bureau (IL Bar No.
 12 6336392)
 13 Daniel B. Roth, Assistant Attorney General,
 14 Consumer Fraud Bureau (IL Bar No. 6290613)
 15 Office of the Illinois Attorney General

1 **LIZ MURRILL**
 2 Attorney General
 3 State of Louisiana

4 */s/ Asyl Nachabe*
 5 Asyl Nachabe (LA Bar No. 38846)
 6 *Pro hac vice*
 7 Assistant Attorney General
 8 Louisiana Department of Justice
 9 Public Protection Division
 10 Consumer Protection Section
 11 1885 N 3rd Street, 4th Floor
 12 Baton Rouge, LA 70802
 13 Tel: (225) 326-6438
 14 NachabeA@ag.louisiana.gov

15 *Attorney for State of Louisiana*

16 **AARON M. FREY**
 17 Attorney General
 18 State of Maine

19 */s/ Michael Devine*
 20 Michael Devine, Maine Bar No. 5048,
 21 *pro hac vice*
 22 Assistant Attorney General
 23 Office of the Maine Attorney General
 24 6 State House Station
 25 Augusta, ME 04333
 26 (207) 626-8800
 27 michael.devine@maine.gov

28 *Attorney for Plaintiff State of Maine*

1 **KEITH ELLISON**
 2 Attorney General
 3 State of Minnesota

4 */s/ Caitlin Micko*
 5 Caitlin Micko (MN Bar No. 0395388),
 6 *pro hac vice*
 7 Assistant Attorney General
 8 Office of the Minnesota Attorney General
 9 445 Minnesota Street, Suite 1200
 10 St. Paul, MN 55101-2130
 11 Tel: (651) 724-9180

1 115 S. LaSalle Street
 2 Chicago, Illinois 60603
 3 312-814-8554
 4 Susan.Ellis@ilag.gov
 5 Greg.Grzeskiewicz@ilag.gov
 6 Jacob.Gilbert@ilag.gov
 7 Matthew.Davies@ilag.gov
 8 Kevin.Whelan@ilag.gov
 9 Adam.Sokol@ilag.gov
 10 Emily.Migliore@ilag.gov
 11 Daniel.Roth@ilag.gov

12
 13 *Attorneys for Plaintiff the People of the State of*
 14 *Illinois*

15
 16 **RUSSELL COLEMAN**
 17 Attorney General
 18 Commonwealth of Kentucky

19
 20 [/s/ Philip R. Heleringer](#)
 21 J. Christian Lewis (KY Bar No. 87109),
 22 *pro hac vice*
 23 Philip Heleringer (KY Bar No. 96748),
 24 *pro hac vice*
 25 Zachary Richards (KY Bar No. 99209),
 26 *pro hac vice*
 27 Daniel I. Keiser (KY Bar No. 100264),
 28 *pro hac vice*
 29 Assistant Attorneys General
 30 1024 Capital Center Drive, Ste. 200
 31 Frankfort, KY 40601
 32 Christian.Lewis@ky.gov
 33 Philip.Heleringer@ky.gov
 34 Zach.Richards@ky.gov
 35 Daniel.Keiser@ky.gov
 36 Phone: (502) 696-5300
 37 Fax: (502) 564-2698

38
 39 *Attorneys for Plaintiff the Commonwealth of*
 40 *Kentucky*

41 caitlin.micko@ag.state.mn.us

42
 43 *Attorney for Plaintiff State of Minnesota, by its*
 44 *Attorney General, Keith Ellison*

45
 46 **ANDREW BAILEY**

47 Attorney General
 48 State of Missouri

49
 50 By: [/s/ Michael Schwalbert](#)
 51 Michael Schwalbert, *pro hac vice*
 52 Assistant Attorney General
 53 Consumer Protection Section
 54 Missouri Attorney General's Office
 55 815 Olive Street | Suite 200
 56 Saint Louis, Missouri 63101
 57 michael.schwalbert@ago.mo.gov
 58 Phone: 314-340-7888
 59 Fax: 314-340-7981

60
 61 *Attorney for Plaintiff State of Missouri, ex rel.*
 62 *Andrew Bailey, Attorney General*

63
 64 **MATTHEW J. PLATKIN**

65 Attorney General
 66 State of New Jersey

67
 68 By: [/s/ Thomas Huynh](#)
 69 Kashif T. Chand (NJ Bar No. 016752008), *pro*
 70 *hac vice*
 71 Section Chief, Deputy Attorney General
 72 Deputy Attorneys General
 73 Thomas Huynh (NJ Bar No. 200942017),
 74 *Pro hac vice*
 75 Assistant Section Chief, Deputy Attorney
 76 General

77
 78 New Jersey Office of the Attorney General,
 79 Division of Law
 80 124 Halsey Street, 5th Floor
 81 Newark, NJ 07101
 82 Tel: (973) 648-2052
 83 Kashif.Chand@law.njoag.gov
 84 Thomas.Huynh@law.njoag.gov

1 **ANTHONY G. BROWN**
 2 Attorney General
 3 State of Maryland

4 */s/ Elizabeth J. Stern*
 5 Philip D. Ziperman (Maryland CPF No.
 9012190379), *pro hac vice*
 6 Deputy Chief, Consumer Protection Division
 Elizabeth J. Stern (Maryland CPF No.
 1112090003), *pro hac vice*
 7 Assistant Attorney General
 Office of the Attorney General of Maryland
 200 St. Paul Place
 Baltimore, MD 21202
 Phone: (410) 576-6417 (Mr. Ziperman)
 Phone: (410) 576-7226 (Ms. Stern)
 Fax: (410) 576-6566
 pziperman@oag.state.md.us
 estern@oag.state.md.us

12 *Attorneys for Plaintiff Office of the Attorney*
 13 *General of Maryland*

15 **MICHAEL T. HILGERS**
 16 Attorney General
 State of Nebraska

17 */s/ Anna Anderson*
 18 Anna Anderson (NE #28080)
 Assistant Attorney General
 Consumer Protection Bureau
 Office of the Nebraska Attorney General
 2115 State Capitol Building
 Lincoln, NE 68509
 Phone: (402) 471-2682
 Email: anna.anderson@nebraska.gov

23 *Attorney for Plaintiff State of Nebraska*

Attorney General and the New Jersey Division
 of Consumer Affairs
 Matthew J. Platkin, Attorney General for the
 State of New Jersey, and Cari Fais, Director
 of the New Jersey Division of Consumer
 Affairs

LETITIA JAMES
 Attorney General
 State of New York

/s/ Kevin Wallace
 Kevin C. Wallace, Senior Enforcement
 Counsel
 (NY Bar No. 3988482), *pro hac vice*
 kevin.wallace@ag.ny.gov
 Alex Finkelstein, Assistant Attorney General
 NY Bar No. 5609623), *pro hac vice*
 alex.finkelstein@ag.ny.gov
 Nathaniel Kosslyn, Assistant Attorney General
 (NY Bar No. 5773676), *pro hac vice*
 nathaniel.kosslyn@ag.ny.gov
 New York Office of the Attorney General
 28 Liberty Street
 New York, NY 10005
 (212) 416-8000

Attorneys for Plaintiff the People of the State
of New York

DAVE YOST
 Attorney General
 State of Ohio

/s/ Kevin R. Walsh
 Melissa G. Wright (Ohio Bar No. 0077843)
 Section Chief, Consumer Protection Section
 Melissa.Wright@ohioago.gov
 Melissa S. Smith (Ohio Bar No. 0083551)
 Asst. Section Chief, Consumer Protection
 Section
 Melissa.S.Smith@ohioago.gov
 Michael S. Ziegler (Ohio Bar No. 0042206)
 Principal Assistant Attorney General
 Michael.Ziegler@ohioago.gov

1
JEFF JACKSON
 2 Attorney General
 3 State of North Carolina

4 */s/ Charles White*
 5 Charles G. White (N.C. State Bar No.
 6 57735), *pro hac vice*
 Assistant Attorney General
 Kunal Choksi
 Senior Deputy Attorney General
 Josh Abram
 Special Deputy Attorney General
 N.C. Department of Justice
 Post Office Box 629
 Raleigh, North Carolina 27602
 Telephone: (919) 716-6006
 Facsimile: (919) 716-6050
 E-mail: cwhite@ncdoj.gov

12 *Attorneys for Plaintiff State of North Carolina*
 13
 14

15 **DAVID W. SUNDAY**
 16 Attorney General
 Commonwealth of Pennsylvania

17 */s/ John M. Abel*
 18 John M. Abel
 Senior Deputy Attorney General
 (PA Bar No. 47313), *pro hac vice*
 Jonathan R. Burns
 Deputy Attorney General
 (PA Bar No. 315205), *pro hac vice*
 Email: jabel@attorneygeneral.gov
 Email: jburns@attorneygeneral.gov
 Pennsylvania Office of the Attorney General
 Strawberry Square, 14th Floor
 Harrisburg, PA 17120
 Tel: 717.645.7269

25 *Attorneys for Plaintiff the Commonwealth of*
 26 *Pennsylvania*

Kevin R. Walsh (Ohio Bar No. 0073999)
pro hac vice
 Kevin.Walsh@ohioago.gov
 Senior Assistant Attorney General
 30 East Broad Street, 14th Floor
 Columbus, Ohio 43215
 Tel: 614-466-1031

Attorneys for State of Ohio, ex rel. Attorney General Dave Yost

DAN RAYFIELD
 Attorney General
 State of Oregon

/s/ John Dunbar
 John Dunbar (Oregon Bar No. 842100), *pro hac vice*
 Assistant Attorney General
 Oregon Department of Justice
 Consumer Protection Section
 100 SW Market Street
 Portland, Oregon 97201
 Telephone: (971) 673-1880
 Facsimile: (971) 673-1884
 E-mail: john.dunbar@doj.state.or.us

Attorneys for State of Oregon, ex rel. Dan Rayfield, Attorney General for the State of Oregon

ALAN WILSON
 Attorney General
 State of South Carolina

/s/ Clark Kirkland, Jr.
 C. Havird Jones, Jr.
 Senior Assistant Deputy Attorney General
 Jared Q. Libet (S.C. Bar No. 74975),
pro hac vice
 Assistant Deputy Attorney General
 Clark C. Kirkland, Jr. (CA SBN 272522)
 Assistant Attorney General
 Anna C. Smith (SC Bar No. 104749),
pro hac vice
 Assistant Attorney General

PETER F. NERONHA

Attorney General
State of Rhode Island

/s/ Stephen N. Provazza

Stephen N. Provazza (R.I. Bar No. 10435),
pro hac vice
Assistant Attorney General
Rhode Island Office of the Attorney General
150 South Main St.
Providence, RI 02903
Phone: 401-274-4400
Email: SProvazza@riag.ri.gov

Attorney for Plaintiff State of Rhode Island

JASON S. MIYARES

Attorney General
Commonwealth of Virginia

/s/ Joelle E. Gotwals

Joelle E. Gotwals (VSB No. 76779),
pro hac vice
Assistant Attorney General
Thomas J. Sanford
Deputy Attorney General
Richard S. Schweiker, Jr. (VSB No. 34258),
pro hac vice
Senior Assistant Attorney General and
Section Chief
Chandler P. Crenshaw (VSB No. 93452)
pro hac vice
Assistant Attorney General and Consumer
Privacy Unit Manager
Office of the Attorney General of Virginia
Consumer Protection Section
202 N. 9th Street
Richmond, Virginia 23219
Telephone: (804) 786-8789
Facsimile: (804) 786-0122
E-mail: jgotwals@oag.state.va.us

*Attorneys for the Plaintiff Commonwealth of
Virginia ex rel. Jason S. Miyares, Attorney
General*

Post Office Box 11549
Columbia, South Carolina 29211
jlibet@scag.gov
ckirkland@scag.gov
annasmith@scag.gov
803-734-0057

*Attorneys for Plaintiff the State of South
Carolina, ex rel. Alan M. Wilson, in His
Official Capacity as Attorney General of the
State of South Carolina*

MARTY J. JACKLEY

Attorney General
State of South Dakota

/s/ Amanda Miiller

By: Amanda Miiller (SD Bar No. 4271),
pro hac vice
Assistant Attorney General
Bret Leigh Nance (SD Bar No. 4831),
pro hac vice
Assistant Attorney General
1302 East Highway 14, Suite 1
Pierre, SD 57501-8501
Telephone: (605) 773-3215
amanda.miiller@state.sd.us

Attorneys for Plaintiff State of South Dakota

JOHN B. MCCUSKEY

Attorney General
State of West Virginia

/s/ Laurel K. Lackey

Laurel K. Lackey (WVSB No. 10267),
pro hac vice
Abby G. Cunningham (WVSB No. 13388)
Assistant Attorneys General
Office of the Attorney General
Consumer Protection & Antitrust Division
Eastern Panhandle Office
269 Aikens Center
Martinsburg, West Virginia 25404

1 **NICHOLAS W. BROWN**
2 Attorney General
3 State of Washington

4 /s/ Alexandra Kory
5 Alexandra Kory (WA Bar No. 49889),
6 *pro hac vice*
7 Joseph Kanada (WA Bar No. 55055),
8 *pro hac vice*
9 Rabi Lahiri
10 Gardner Reed
11 Claire McNamara
12 Assistant Attorneys General
13 Washington State Office of the Attorney General
14 800 Fifth Avenue, Suite 2000
15 Seattle, WA 98104
16 (206) 516-2997
17 Alexandra.kory@atg.wa.gov

18 *Attorneys for Plaintiff State of Washington*

19 (304) 267-0239
20 laurel.k.lackey@wvago.gov

21 *Attorneys for Plaintiff State of West
22 Virginia, ex rel. Patrick Morrisey,
23 Attorney General*

24 **JOSHUA L. KAUL**
25 Attorney General State
26 of Wisconsin

27 /s/ Colin R. Stroud
28 Colin R. Stroud
1 Assistant Attorney General
2 WI State Bar #1119457, *pro hac vice*
3 Wisconsin Department of Justice
4 Post Office Box 7857
5 Madison, Wisconsin 53707-7857
6 (608) 261-9224
7 stroudcr@doj.state.wi.us

8 *Attorneys for Plaintiff State of Wisconsin*

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28